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December 5, 2022

District Judge Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Sq
New York NY 10007

Re: 1:22-cv-07962-RA
Dakus v. Koninklijke Luchtvaart
Maatschappij, N.V.

Dear District Judge Abrams:

This office represents the Plaintiff. In accordance with the Court's Individual Rules, Plaintiff, with consent of the Defendant, requests an adjournment of the initial status conference and the accompanying submissions. The original date for the initial status conference is December 16, 2022, at 1:30 PM with accompanying submissions due December 9, 2022.

This action was filed on September 17, 2022. ECF No. 1. On November 23, 2022, Plaintiff filed a waiver of service setting Defendant's answer or responsive pleading due on January 22, 2023.

The parties request an adjournment of the initial conference and the accompanying submissions from December 16 because, as of that date, the Defendant will not have answered or moved to dismiss. It is therefore in the interest of judicial economy to defer the initial conference. The parties respectfully submit that the initial conference should be deferred until Your Honor has ruled upon Defendant's anticipated motion to dismiss, as it would be in the interest of judicial economy and fairness to permit the parties to brief Defendant's motion before they discuss discovery and case deadlines with each other and the Court.

There have been no previous requests for adjournments of the initial conference and extensions of time to file the accompanying submissions. No previous request was granted or denied. Defendant consents to this request. This request is submitted at least 48 hours prior to the initial conference. Thank you.

Respectfully submitted,

/s/Spencer Sheehan

Certificate of Service

I certify that on December 5, 2022, I served and/or transmitted the foregoing by the method below to the persons or entities indicated, at their last known address of record (blank where not applicable).

	CM/ECF	First-Class Mail	Email	Fax
Defendant's Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plaintiff's Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Courtesy Copy to Court	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

/s/ Spencer Sheehan